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 and Nexgen Mediatech USA, Inc.

[Additional Defendants and Counsel listed
 on signature page]

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

This Document Relates to Individual
 Case No. 3:10-cv-04945-SI

TARGET CORP., *et al.*,

Plaintiffs,

v.

AU OPTRONICS CORPORATION, *et al.*,

Defendants.

CASE NO. 3:10-cv-04945-SI

MDL NO. 3:07-md-1827-SI

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING TIME TO
 RESPOND TO FIRST AMENDED
 COMPLAINT**

1 The undersigned counsel, on behalf of their respective clients, hereby respectfully request
2 an extension of Defendants' deadline to respond to the first amended complaint filed by Plaintiffs
3 Target Corporation; Sears, Roebuck and Co.; Kmart Corporation; Old Comp Inc.; Good Guys, Inc.;
4 RadioShack Corporation; and Newegg Inc. on May 18, 2011, in the above-captioned litigation.

5 WHEREAS the undersigned Defendants jointly filed a motion to dismiss the first amended
6 complaint on July 5, 2011;

7 WHEREAS Plaintiffs filed a motion for leave to file a second amended complaint on
8 August 5, 2011, which Defendants opposed;

9 WHEREAS the Court entered an order granting in part and denying in part Defendants'
10 joint motion to dismiss the first amended complaint on August 24, 2011, which included a ruling
11 dismissing Plaintiffs' New York state law claims to the extent they arose prior to December 23,
12 1998 and the Nevada state law claims to the extent they arose prior to October 1, 1999 (the
13 "Dismissed Claims");

14 WHEREAS Defendants' current deadline to answer the first amended complaint is
15 September 7, 2011;

16 WHEREAS the Court is scheduled to hear oral argument on Plaintiffs' motion for leave to
17 file a second amended complaint on September 9, 2011;

18 WHEREAS Plaintiffs and Defendants agree that it would serve the interests of the parties to
19 extend Defendants' deadline to respond to the first amended complaint until after the Court rules on
20 Plaintiffs' pending motion for leave to file a second amended complaint.

21 THEREFORE, Plaintiffs and Defendants, by their respective counsel, stipulate and agree as
22 follows:

23 -- If the Court grants Plaintiffs' motion for leave to file a second amended complaint,
24 (a) Plaintiffs agree to dismiss the Dismissed Claims with prejudice from the second amended
25 complaint and (b) Defendants will answer the second amended complaint within twenty-one (21)
26 days of the Court's order on the motion for leave to amend.

-- If the Court denies Plaintiffs' motion for leave to file a second amended complaint, Defendants will file their answer to Plaintiffs' first amended complaint within twenty-one (21) days of the Court's order on the motion for leave to amend.

Dated: September 6, 2011

Respectfully submitted,

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1 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this
2 document has been obtained from all parties whose signatures are indicated by a "confirmed"
3 signature (/s/) within this e-filed document.
4


5 Dated: September 6, 2011

Christopher B. Hockett /SDW
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[PROPOSED] ORDER

Having considered the foregoing stipulation, and for good cause appearing,
IT IS SO ORDERED.

Dated: 9/7, 2011


The Honorable Susan Illston
United States District Judge